

DAVIS WRIGHT TREMAINE LLP

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

AMAZON.COM, INC., a Delaware corporation,  
and AMAZON TECHNOLOGIES, INC., a  
Nevada corporation,

Plaintiffs,

v.

UMER WASIM, et al.,

Defendants.

Case No. 4:23-cv-05580-DMR

[PROPOSED] ORDER GRANTING  
PLAINTIFF AMAZON.COM, INC.'S  
MOTION FOR EXPEDITED DISCOVERY  
RELATING TO DEFENDANTS' IDENTITY

This matter comes before the Court on Plaintiffs Amazon.com, Inc. and Amazon Technologies, Inc.'s ("Amazon") Motion for Expedited Discovery Relating to Defendants' Identity. Having reviewed the complaint and the papers filed in connection with this matter, the Court finds good cause to grant Amazon leave to conduct expedited discovery as follows:

Amazon is granted leave, prior to the Rule 26(f) conference, to serve Rule 45 subpoenas on the following companies solely for the purpose of obtaining account information that may help identify Defendants:

- a) NameCheap, Inc. (the company that registered several of Defendant Does' domains);

- b) GoDaddy.com, LLC (the company that registered several of Defendant Does' domains);
- c) Stripe, Inc. (the company that processed a payment to Defendant Doe operating as TMAZ Services Digital);
- d) Google, Inc. (the company controlling the email address used by Defendant Doe operating as Atlas Technologies to register the domain amazonproinc.com, and administering the accounts linked to Google tags, used on several websites operated by Defendant Does);
- e) Vonage America, LLC (a company administering phone numbers advertised on websites operated by Defendant Does);
- f) Level 3 Communications/Lumen (a company administering phone numbers advertised on websites operated by Defendant Does);
- g) Onvoy, LLC/Sinch (a company administering phone numbers advertised on websites operated by Defendant Does);
- h) Dialpad, Inc. (a company administering phone numbers advertised on websites operated by Defendant Does);
- i) Telnyx, LLC (a company administering phone numbers advertised on websites operated by Defendant Does);
- j) Bandwidth, Inc. (a company administering phone numbers advertised on websites operated by Defendant Does);
- k) Regus/IWG PLC Group (a company offering virtual addresses advertised on websites operated by Defendant Does);
- l) Annex Brands, Inc. (a company offering virtual addresses advertised on websites operated by Defendant Does);
- m) Sustainable 2 U, Inc. (a company offering virtual addresses advertised on websites operated by Defendant Does);
- n) TT Post Services, Inc. (a company offering virtual addresses advertised on websites operated by Defendant Does); and

o) Zendesk/Zopim (a company offering a chat service, utilized by websites operated by Defendant Does).

Amazon is also granted leave, prior to the Rule 26(f) conference, to serve additional Rule 45 subpoenas on other companies or individuals (e.g., banks, credit card companies, internet service providers, etc.) that may be discovered from the information possessed by the companies identified in the previous paragraph, and which could reasonably lead to the discovery or confirmation of Defendants' identities.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2023.

\_\_\_\_\_  
DONNA M. RYU  
United States District Judge

Presented by:

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